

# TSCA Solutions

## ■ Technical:

- Develop alternative (non-chlorinated) products
- Develop products w/reduced levels of PCBs
- Eliminate Phthalocyanine dyes and replace with non-PCB alternative products
- Establish new threshold for Dialyride yellow dyes at 1 ppm – CPMA Domestic
- Develop new end-of-pipe treatment for PCB abatement
- Perform risk assessment of all 209 congeners

## ■ Regulatory/Policy/Legal:

- Eliminate TSCA allowance for inadvertent PCB products
- General phase-out of TSCA allowance (level playing field, 1 ppm)
- Encourage End-Users to use lower or non-PCB containing products (Publishers, Printers, Packaging, State DOT's, etc.)
- Incentivize competitive marketing advantage with use of non-PCB containing products
- Regulate only the 12 Dioxin like PCBs
- Do not regulate lower congener PCBs (Europe)
- Provide NPDES permit offsets for inadvertent PCBs
- Provide NPDES Permit exclusion for inadvertent PCBs
- Streamline approval/cost for new chemical products
- Federal (Government Accountability Office) or State Bills to address above
- Petition EPA to develop “Voluntary Procedures for Recycling Paper” similar to “Polychlorinated Biphenyls: Recycling Plastics from Shredder Residue, Voluntary Procedures for Recycling Plastics from Shredder Residue” ([ HYPERLINK "<https://www.regulations.gov/document?D=EPA-HQ-OPPT-2012-0902-0049>" ])

## ■ Convene Stakeholder Task Force to vet & offer solutions:

- Regulatory, Technical, Legal and Policy